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17 *Attorney for Defendant*

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19 UNITED STATES DISTRICT COURT
20 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

21 DISNEY ENTERPRISES, INC.,

22 Plaintiff,

23 vs.
24

25 RED EARTH GROUP LIMITED, d/b/a
26 SATÉUR,

27 Defendant.
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Case No. 2:25-cv-06469-DSF-BFM

**JOINT STIPULATION
REGARDING [PROPOSED] FINAL
JUDGMENT AND PERMANENT
INJUNCTION**

Judge: Hon. Dale S. Fischer

1 WHEREAS, on July 16, 2025, Plaintiff Disney Enterprises, Inc. initiated the
2 above-captioned action against Defendant Red Earth Group Limited d/b/a Sat  ur
3 (collectively, the “Parties”).

4 WHEREAS, the Parties reached an agreement regarding a stipulated Final
5 Judgment and Permanent Injunction, in the form attached hereto.

6 NOW, THEREFORE, the Parties, by and through their undersigned counsel,
7 hereby stipulate:

8 1. To the entry of the [Proposed] Final Judgment and Permanent
9 Injunction in the form attached hereto as Exhibit A; and

10 2. That Defendant irrevocably and fully waives any and all right to appeal
11 the Final Judgment and Permanent Injunction, to have it vacated or set aside, to seek
12 or obtain a new trial thereon, or to otherwise to attack in any way, directly or
13 collaterally, its validity or enforceability.

14
15 IT IS SO STIPULATED.

16 DATED: October 8, 2025

MUNGER, TOLLES & OLSON LLP

17 By: /s/ Kelly M. Klaus

18 KELLY M. KLAUS

19 Attorney for Plaintiff

20 DATED: October 8, 2025

RED EARTH GROUP LIMITED

21 By: /s/ Lincoln D. Bandlow

22 LINCOLN D. BANDLOW

23 Attorney for Defendant
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1 **FILER'S ATTESTATION**

2 I, Kelly M. Klaus, am the ECF user whose identification and password are
3 being used to file this **JOINT STIPULATION REGARDING [PROPOSED]**
4 **FINAL JUDGMENT AND PERMANENT INJUNCTION**. Pursuant to Civil
5 Local Rule 5-4.3.4(a)(2)(i), I hereby attest that the other above-named signatory
6 concurs in this filing.

7
8 DATED: October 8, 2025

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11 /s/ Kelly M. Klaus

12 KELLY M. KLAUS
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